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Attorneys for Claimant Linda Garwood

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In Re
PG&E CORPORATION,
and
PACIFIC GAS AND ELECTRIC
COMPANY
Debtors.

Affects:

PG&E Corporation
Pacific Gas & Electric Company
Both Debtors

* All papers shall be filed in the Lead
Case, No. 19-30088 (DM).

Case No. 19-30088 (DM)

Chapter 11

(Lead Case—Jointly Administered)

**ANGELA JAE CHUN'S
DECLARATION IN SUPPORT OF
LINDA GARWOOD'S MOTION TO
DEEM HER LATE-FILED CLAIM
TIMELY**

Date: March 24, 2021

Time: 10:00 a.m. (Pacific)

Place: **Telephonic Appearances Only**
United States Bankruptcy

Court: Courtroom 17, 16th Floor
San Francisco, CA 94102

Objection Deadline: December 1, 2020

1. My name is Angela Jae Chun and I have been a practicing attorney for almost fourteen years.
2. I am admitted in all courts in California including the Northern District of California from which this Bankruptcy arises.
3. I am the attorney of record for Linda Garwood.

1 4. Ms. Garwood has a genuine claim for damages against PG&E as she her
2 home burned down and she had to be evacuated from the fire.

3 5. Ms. Garwood sought counsel. Unfortunately, these attorneys
4 inadvertently neglected to file a timely Proof of Claim on her behalf.

5 6. This mistake is easily correctable if the Court grant her motion.

6 7. Once it does so, she can submit a virtuous claim with the Fire Victim's
7 Trust.

8 8. Attached as Exhibit "A" hereto is true and correct copy of Ms.
9 Garwood's Proof of Claim.

10 I swear under the penalty of perjury under the State of California that all the
11 foregoing is true and correct.

12 /s/Angela Jae Chun

13 ANGELA JAE CHUN
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